

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION

This document relates to:
All Actions

No. 19-md-2875-RBK-KW

Honorable Robert Kugler
Magistrate Karen Williams
Special Master Thomas Vanaskie

**PLAINTIFFS' NOTICE OF MOTION
FOR SANCTIONS FOR DEFENDANT
ZHP'S OBSTRUCTION AND FAILURE
TO PROVIDE RESPONSIVE
DEPOSITION TESTIMONY**

To: Seth A. Goldberg
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PLEASE TAKE NOTICE that on a date as soon as June 21, 2021, or as soon thereafter as counsel may be heard, Plaintiffs, by and through their undersigned counsel, shall move before the Honorable Robert B. Kugler, the Honorable Karen M. Williams, and the Honorable Special Master Thomas I. Vanaskie, for a MOTION for sanctions for Defendant ZHP's obstruction and failure to provide responsive deposition testimony. Plaintiffs note that they did not file their supporting brief on ECF because ZHP has over designated the deposition transcripts of its witnesses as confidential. However, Plaintiffs will email the brief to the Court and Defendants for their review.

Dated: May 27, 2021

Respectfully Submitted,

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